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PAGE 1 / 2

September 12, 2014

Ms. Jill Sugarman
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

IDENTIFICATION NUMBER: C00477984

REFERENCE: JULY QUARTERLY REPORT (06/05/2014 - 06/30/2014)

Dear Ms. Sugarman,

This statement is in response to the Commission's letter dated August 14, 2014. The Commission requested additional information on five items.

First, the Commission requested clarification regarding individuals or political committees that appear to exceed federal limits. Upon review by the Committee, these individuals and political committees are within their federal limits. The \$1,000 contribution from Lewis Topper on 6/6/14 was designated for the General election but was misreported as being designated to the Primary. This will be corrected on an Amended report (See TransID SA11AI.10101) Peter C. Vail is within his federal limits but due to a FECfile merge problem his aggregates were incorrect and hence the \$1,600 contribution was designated for the General election but was misreported as being designated to Primary. This will be corrected on an Amended report (See TransID SA11AI.10964). George T. Whalen III is within his federal limits but due to a FECfile merge problem his aggregates were incorrect and hence a redesignation was reported incorrectly. The aggregates and redesignation for Mr. Whalen will be corrected on an Amended report (See TransID SA11AI.10427 and TransID SA11AI.15484). The contributions from the International Association of Firefighters (C00029447) are within their federal limits. Due to the corrections made on the Amended Pre-Primary report, the \$2,500 contribution on 6/18/14 should be designated to the General election. The redesignation has been removed on an Amended July Quarterly (See TransID SA11C.10809).

Second, the Commission requested clarification regarding contributions that appear to be from limited liability companies. With respect to LLCs, our Committee has safeguards in place to ensure that contributions are made by eligible donors only. The contributions from Dutchess Management LLC and PBB LLC were made with federally permissible funds.

Third, the Commission requested additional information regarding an in-kind contribution by Peter G. Cecchini. The election designation was reported incorrectly. The in-kind was designated for the Primary election and will be reflected accordingly on an Amended report. The excess of \$700 was refunded on 8/15/14.

Fourth, the Commission requested additional clarification regarding contributions received after the 2014 primary election that are designated for the 2014 primary. The \$95 contribution from Richard Sardo designated for the General election but was misreported as being designated to the Primary. This will be corrected on an Amended report (See TransID SA11AI.11320)

Fifth, the Commission requested additional information regarding contributions disclosed on Schedule A of our report. Due to a staff miscommunication, the in-kind contributions from Peter and Luiza Cecchini were inadvertently omitted from a 48-hour report. These contributions will be added to an Amended 6/7/14 48-hour report. Regarding the contribution from Wal-Mart Stores Inc. PAC, the contribution of \$1,000 on 6/6/14 was reported on the 6/8/14 48-Hour report (see Trans ID F6.7805). Regarding the contribution from the International Association of Firefighters, the original contribution of
